

LAUREN M. BLAS, SBN 296823
lblas@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520

GEOFFREY SIGLER (*pro hac vice*)
gsigler@gibsondunn.com
DEREK KRAFT (*pro hac vice*)
dkraft@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Telephone: 202.955.8500
Facsimile: 202.467.0539

Attorneys for Defendants
UNITED BEHAVIORAL HEALTH and
UNITEDHEALTHCARE INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LD, DB, BW, RH, and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITEDHEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation,
UNITED BEHAVIORAL HEALTH, a
California Corporation, and MULTIPLAN,
INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR

**JOINT STATEMENT IN RESPONSE TO
THE COURT'S ORDER DIRECTING
PARTIES TO MEET AND CONFER
REGARDING OUTSTANDING SEALING
DISPUTES AT DKT. 461**

Hon. Yvonne Gonzalez Rogers

Complaint filed: April 2, 2020

Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH and CJ, United Behavioral Health and United Healthcare Insurance
2 Company (“United Defendants”) and MultiPlan, Inc. (“MultiPlan”), collectively the “Parties,” to the
3 above-entitled action jointly submit this statement in response to the Court’s November 13, 2024 Order
4 Directing Parties to Meet and Confer Regarding Outstanding Sealing Disputes (Dkt. 461, the “Order”).

5 Pursuant to the Order, the Parties met and conferred on November 18, 2024 and November 20,
6 2024 and have selected “twenty (20) representative sealing requests that are representative of the
7 broader universe of disputes between the Parties.” Order at 1. United Defendants and MultiPlan have
8 each selected seven requests, and Plaintiffs have selected six requests. The sealing requests are detailed
9 in the chart attached as **Exhibit A**. The parties are available to assist the Court if it needs hard copies
10 of any materials, or any further information.

11 *[signatures on next page]*

1 DATED: November 22, 2024

Respectfully submitted,

2 GIBSON, DUNN & CRUTCHER LLP

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4 By: /s/ Derek Kraft

Derek Kraft

5 Attorneys for Defendants UNITED
6 BEHAVIORAL HEALTH and UNITED
7 HEALTHCARE INSURANCE COMPANY

8 DATED: November 22, 2024

PHELPS DUNBAR LLP

9
10 By: /s/ Errol J. King, Jr.

Errol J. King, Jr.

11 Attorneys for Defendant MULTIPLAN, INC.

12 ERROL J. KING, JR. (*admitted pro hac vice*)
13 PHELPS DUNBAR LLP
14 II City Plaza, 400 Convention Street, Suite 1100
15 Baton Rouge, Louisiana 70802
16 Telephone: (225) 376-0207
17 Facsimile: (225) 381-9197
18 Errol.King@phelps.com

19 Dated: November 22, 2024

ARNALL GOLDEN GREGORY LLP

20 By: /s/ Matthew Lavin

Matthew Lavin

21 Attorneys for PLAINTIFFS
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ATTESTATION PURSUANT TO LOCAL RULE 5-1

I, Derek Kraft, am the ECF user whose identification and password are being used to file this document. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from the other signatories hereto.

Dated: November 22, 2024

/s/ Derek Kraft

Derek Kraft